

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION
COLUMBUS

UNITED STATES OF AMERICA :

NO. **2:08 cr 149**

29 U.S.C. §439(b)

v. :

29 U.S.C. §501(c)

JUDGE HOLSCHUH

TINA L. CURTIS :

I N D I C T M E N T

THE GRAND JURY CHARGES:

COUNT 1

1. That at all times hereinafter mentioned and within the meaning of Sections 3(i) and 3(j) of the Labor-Management Reporting and Disclosure Act of 1959, 29 U.S.C. §402(i) and §402(j), hereinafter referred to as the Act:

(a) American Postal Workers Union, Local 232, hereinafter referred to as the Union, was and is a labor organization representing employees in an industry affecting commerce and has conducted and conducts its operations in Columbus, Ohio, and maintained an office in Columbus, Ohio.

(b) At all times relevant herein, the defendant, TINA L. CURTIS, was the Secretary-Treasurer of the Union and as such was an officer and an employee of a labor organization within the meaning of sections 3(n) of the Act [29 U.S.C. §402(n)].

2. From on or about August 3, 2004, to on or about August, 3, 2005, in the Southern District of Ohio, the defendant, TINA L. CURTIS, while an officer, that is, Treasurer-Secretary of the Union, did unlawfully and willfully embezzle, steal and abstract and convert to her own use, approximately eighteen thousand, two hundred eighty-three dollars and eight cents (\$18,283.08), which monies and funds belonged to said Union.

In violation of 29 U.S.C. §501(c).

COUNT 2

1. Paragraphs 1 and 2 of Count 1 are incorporated as if fully realleged herein.

2. From on or about January 1, 2004, through on or about December 31, 2005, in the Southern District of Ohio, the defendant TINA L. CURTIS, did make and cause to be made false statements and representations of material facts knowing them to be false, and knowingly failed to disclose material facts in reports and documents required to be filed by the Union with the Secretary of Labor pursuant to Section 431(b) of Title 29, United States Code, that is, the annual financial reports of the Union (known as LM-2s) failed to report that the defendant TINA L. CURTIS, did not deposit \$13,007.43 in funds collected by the


Union, and did not report as receipts the checks she substituted for cash.

In violation of 29 U.S.C. §439(b).

A TRUE BILL

s/Foreperson
FOREPERSON

GREGORY G. LOCKHART
UNITED STATES ATTORNEY


GARY L. SPARTIS
DEPUTY CRIMINAL CHIEF